

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JASON DELEON, ANA  
CARRACA-DELEON, ARIELA ROSA  
MORI-GEHRING, WALTER GEHRING, and  
DANIEL PENA,

Plaintiffs,

-against-

Douglas Dunaway as the Administrator of  
Maria Louise Dunaway, DOUGLAS  
DUNAWAY and MICHAEL DUNAWAY,  
Defendants.

Case No.: 7:22-cv-06039 (NSR)

**VERIFIED ANSWER AND  
AFFIRMATIVE DEFENSES**

Defendant Douglas Dunaway both individually and as administrator of the Estate of Maria Louise Dunaway, by and through their undersigned counsel Michele Marianna Bonsignore, files this Answer to Plaintiffs' Verified Complaint (hereinafter "complaint"), and states as follows:

**INTRODUCTION**

1. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 1 of the complaint.
2. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 2 of the complaint.
3. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 3 of the complaint.
4. Defendant denies the allegations in paragraph 4 of the complaint.
5. Defendant admits the allegations in paragraph 5 of the complaint to the extent that they are a description of the location of Staub Court.

6. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 6 of the complaint.

7. Defendant admits that Defendants are a husband and wife and their adult son, who also live on Staub Court. Defendant denies the remaining allegations in paragraph 7 of the complaint.

8. Defendant denies the allegations in paragraph 8 of the complaint.

9. Defendant denies the allegations in paragraph 9 of the complaint.

10. Defendant denies the allegations in paragraph 10 of the complaint.

11. Defendant denies the allegations in paragraph 11 of the complaint.

12. Defendants deny that the Plaintiffs are entitled to any remedy in paragraph 12 of the complaint.

13. Defendant denies the allegations in paragraph 13 of the complaint and deny that the Plaintiffs are entitled to any remedy in paragraph 13 of the complaint.

#### **BASIS OF THE ALLEGATIONS**

14. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 14 of the complaint.

#### **JURISDICTION & VENUE**

15. Denied in part; admitted in part. Paragraph 15 contains conclusions of law to which no response is required. Defendant admits that this Court has jurisdiction to hear this complaint under 28 U.S.C. §§ 1331, 1343.

16. Defendant admits that this Court has jurisdiction to hear state law claims under 28 U.S.C. § 1367(a).

17. Defendant admits that venue is properly found in the United States District Court for the Southern District of New York. Defendant is without knowledge as to where any acts or omissions occurred.

#### THE PARTIES

##### The Plaintiffs

18. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 18 of the complaint.

19. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 19 of the complaint.

20. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 20 of the complaint.

21. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 21 of the complaint.

22. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 22 of the complaint.

##### The Defendants

23. Defendant admits the contents of paragraph 23 of the complaint.

24. Defendant admits the contents of paragraph 24 of the complaint.

25. Denied in part; admitted in part. Defendant admits that Louise was the Court Clerk for the Village of Mamaroneck Justice Court. Defendant denies the remaining allegations in the paragraph.

26. Defendant admits the contents of paragraph 27 of the complaint.

#### CONFIDENTIAL WITNESSES

27. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 27 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

28. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 28 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

29. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 29 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

30. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 30 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

31. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 31 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

32. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 32 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

33. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 33 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

34. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 34 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

35. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 35 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

36. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 36 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

37. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 37 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

38. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 38 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

39. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 39 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

40. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 40 of the complaint. Defendant also denies any allegations of any misconduct against Defendant.

#### **FACTUAL ALLEGATIONS**

##### **The Plaintiffs are Well-Rounded and Accomplished Individuals**

41. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 41 of the complaint.

42. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 42 of the complaint.

43. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 43 of the complaint.

44. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 44 of the complaint.

45. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 45 of the complaint.

46. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 46 of the complaint.

47. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 47 of the complaint.

48. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 48 of the complaint.

**Before the Plaintiffs, the Dunaways Harassed and Intimidated Other Hispanic Residents of**

**Staub Court**

49. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 49 of the complaint.

50. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 50 of the complaint.

51. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 51 of the complaint.
52. Defendant denies the allegations in paragraph 52 of the complaint.
53. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 53 of the complaint.
54. Defendant denies the allegations in paragraph 54 of the complaint.
55. Defendant denies the allegations in paragraph 55 of the complaint.
56. Defendant denies the allegations in paragraph 56 of the complaint.
57. Defendant denies the allegations in paragraph 57 of the complaint.
58. Defendant denies the allegations in paragraph 58 of the complaint.

**January 2017: Jason DeLeon Moves Into Staub Court**

59. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 59 of the complaint.
60. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 60 of the complaint.
61. Defendant denies the allegations in paragraph 61 of the complaint.
62. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 62 of the complaint.
63. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 63 of the complaint.
64. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 64 of the complaint.
65. Defendant denies the allegations in paragraph 65 of the complaint.

66. Defendant denies the allegations in paragraph 66 of the complaint.
67. Defendant denies the allegations in paragraph 67 of the complaint.
68. Defendant denies the allegations in paragraph 68 of the complaint.
69. Defendant denies the allegations in paragraph 69 of the complaint.
70. Defendant denies the allegations in paragraph 70 of the complaint.
71. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 71 of the complaint.
72. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 72 of the complaint.
73. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 73 of the complaint.
74. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 74 of the complaint.
75. Defendant denies the allegations in paragraph 75 of the complaint.
76. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 76 of the complaint.
77. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 77 of the complaint.
78. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 78 of the complaint.
79. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 79 of the complaint.

80. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 80 of the complaint.

81. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 81 of the complaint.

82. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 82 of the complaint.

83. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 83 of the complaint.

84. Defendant denies the allegations in paragraph 84 of the complaint.

85. Defendant denies the allegations in paragraph 85 of the complaint.

86. Defendant denies the allegations in paragraph 86 of the complaint.

87. Defendant denies the allegations in paragraph 87 of the complaint.

88. Denied in part; admitted in part. Defendant admits that a cease and desist letter was sent to Plaintiffs. However, said letter was neither frivolous nor threatening.

89. Defendant denies the allegations in paragraph 89 of the complaint.

90. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 90 of the complaint.

91. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 91 of the complaint.

92. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 92 of the complaint.

93. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 93 of the complaint.

94. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 94 of the complaint.

95. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 95 of the complaint.

96. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 96 of the complaint.

97. Defendant denies the allegations in paragraph 97 of the complaint.

98. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 98 of the complaint.

99. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 99 of the complaint.

100. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 100 of the complaint.

101. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 101 of the complaint.

102. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 102 of the complaint.

103. Defendant denies the allegations in paragraph 103 of the complaint.

104. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 104 of the complaint.

**In April 2020, the Gehring Purchase 5 Staub Court**

105. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 105 of the complaint.

106. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 106 of the complaint.

107. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 107 of the complaint.

108. Defendant denies the allegation in paragraph 108 of the complaint.

109. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 109 of the complaint.

110. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 110 of the complaint.

111. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 111 of the complaint.

June 2020: The Dunaways Meet and See Ariela for the First Time

112. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 112 of the complaint.

113. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 113 of the complaint.

114. Defendant denies the allegations in paragraph 114 of the complaint.

115. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 115 of the complaint.

116. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 116 of the complaint.

117. Defendant denies the allegation in paragraph 117 of the complaint.

118. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 118 of the complaint.

119. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 119 of the complaint.

120. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 120 of the complaint.

121. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 121 of the complaint.

122. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 122 of the complaint.

123. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 123 of the complaint.

124. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 124 of the complaint.

125. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 125 of the complaint.

126. Defendant denies the allegations in paragraph 126 of the complaint.

127. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 127 of the complaint.

128. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 128 of the complaint.

129. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 129 of the complaint.

130. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 130 of the complaint.

131. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 131 of the complaint.

132. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 132 of the complaint.

133. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 133 of the complaint.

134. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 134 of the complaint.

135. Defendant denies the allegations in paragraph 135 of the complaint.

136. Defendant denies the allegations in paragraph 136 of the complaint.

137. Defendant denies the allegations in paragraph 137 of the complaint.

138. Defendant denies the allegations in paragraph 138 of the complaint.

139. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 139 of the complaint.

140. Defendant denies the allegations in paragraph 140 of the complaint.

141. Defendant denies the allegations in paragraph 141 of the complaint.

142. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 142 of the complaint.

143. Defendant denies the allegations in paragraph 143 of the complaint.

144. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 144 of the complaint.

145. Defendant denies the allegations in paragraph 145 of the complaint.

146. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 146 of the complaint.

147. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 147 of the complaint.

148. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 148 of the complaint.

149. Defendant denies the allegations in paragraph 149 of the complaint.

150. Defendant denies the allegations in paragraph 150 of the complaint.

151. Defendant denies the allegations in paragraph 151 of the complaint.

152. Defendant denies the allegations in paragraph 152 of the complaint.

153. Defendant denies the allegations in paragraph 153 of the complaint.

154. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 154 of the complaint.

155. Defendant denies the allegations in paragraph 155 of the complaint.

156. Paragraph 157 of the complaint contains conclusions of law to which no response is required. Defendant denies, however, that he committed the actions stated in the paragraph.

157. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 157 of the complaint.

158. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 158 of the complaint.

**December 2020: The Dunaways Succeed in Driving a Hispanic Family Out of Staub Court and Their Conspiracy to Drive Plaintiffs and Other Hispanics Out Continues**

159. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 159 of the complaint.

160. Defendant denies the allegations in paragraph 160 of the complaint.

161. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 161 of the complaint.

162. Defendant denies the allegations in paragraph 162 of the complaint.

163. Defendant denies the allegations in paragraph 162 of the complaint.

164. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 164 of the complaint.

165. Defendant denies the allegations in paragraph 165 of the complaint.

166. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 166 of the complaint.

167. Defendant denies the allegations in paragraph 167 of the complaint.

168. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 168 of the complaint.

169. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 169 of the complaint.

170. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 170 of the complaint.

171. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 171 of the complaint.

172. Defendant denies the allegations in paragraph 172 of the complaint.

173. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 173 of the complaint.

174. Defendant denies the allegation in paragraph 174 of the complaint.

175. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 15 of the complaint.

176. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 176 of the complaint.

**Ariela and Walt Move Into Their New Home and are Greeted With Racism, Harassment, and False Complaints to VOMPD**

177. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 177 of the complaint.

178. Defendant denies the allegations in paragraph 178 of the complaint.

179. Defendant denies the allegation in paragraph 179 of the complaint.

180. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 180 of the complaint.

181. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 181 of the complaint.

182. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 182 of the complaint.

183. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 183 of the complaint.

184. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 184 of the complaint.

185. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 185 of the complaint.

186. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 186 of the complaint.

187. Defendant denies the allegations in paragraph 187 of the complaint.

188. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 188 of the complaint.

189. Defendant denies the allegations in paragraph 189 of the complaint.

190. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 190 of the complaint.

191. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 191 of the complaint.

192. Defendant denies the allegations in paragraph 192 of the complaint.

193. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 193 of the complaint.

194. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 194 of the complaint.

195. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 195 of the complaint.

196. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 196 of the complaint.

197. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 197 of the complaint.

198. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 198 of the complaint.

199. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 199 of the complaint.

200. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 200 of the complaint.

201. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 201 of the complaint.

202. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 202 of the complaint.

203. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 203 of the complaint.

204. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 204 of the complaint.

205. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 205 of the complaint.

206. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 206 of the complaint.

207. Defendant denies the allegations in paragraph 207 of the complaint.

208. Defendant denies the allegations in paragraph 208 of the complaint.

209. Defendant denies the allegations in paragraph 209 of the complaint.

210. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 210 of the complaint.

211. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 211 of the complaint.

212. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 212 of the complaint.

213. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 213 of the complaint.

214. Defendant denies the allegations in paragraph 214 of the complaint.

215. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 215 of the complaint.

216. Defendant denies the allegations in paragraph 216 of the complaint.

217. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 217 of the complaint.

218. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 218 of the complaint.

219. Defendant denies the allegations in paragraph 219 of the complaint.

220. Defendant denies the allegations in paragraph 220 of the complaint.

221. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 221 of the complaint.

222. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 222 of the complaint.

223. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 223 of the complaint.

224. Defendant denies the allegations in paragraph 224 of the complaint.

225. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 225 of the complaint.

226. Defendant denies the allegations in paragraph 226 of the complaint.

227. Defendant denies the allegations in paragraph 227 of the complaint.

228. Defendant denies the allegations in paragraph 228 of the complaint.

229. Defendant denies the allegations in paragraph 229 of the complaint.

230. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 230 of the complaint.

231. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 231 of the complaint.

232. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 232 of the complaint.

233. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 233 of the complaint.

234. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 234 of the complaint.

235. Defendant denies the allegations in paragraph 235 of the complaint.

236. Defendant denies the allegations in paragraph 236 of the complaint.

237. Defendant denies the allegations in paragraph 237 of the complaint.

238. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 238 of the complaint.

239. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 239 of the complaint.

240. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 240 of the complaint.

241. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 241 of the complaint.

242. Defendant denies the allegations in paragraph 242 of the complaint.

243. Defendant denies the allegations in paragraph 243 of the complaint.

244. Defendant denies the allegations in paragraph 244 of the complaint.

245. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 245 of the complaint.

246. Defendant denies the allegations in paragraph 246 of the complaint.

247. Defendant denies the allegations in paragraph 247 of the complaint.

248. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 248 of the complaint.

249. Defendant denies the allegations in paragraph 249 of the complaint.

250. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 250 of the complaint.

251. Defendant denies the allegations in paragraph 251 of the complaint.

252. Defendant denies the allegations in paragraph 252 of the complaint.

253. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 253 of the complaint.

254. Defendant denies the allegations in paragraph 254 of the complaint.

255. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 255 of the complaint.

256. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 256 of the complaint.

257. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 257 of the complaint.

258. Defendant denies the allegations in paragraph 258 of the complaint.

259. Defendant denies the allegations in paragraph 259 of the complaint.

260. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 260 of the complaint.

261. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 262 of the complaint.

262. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 262 of the complaint.

263. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 263 of the complaint.

264. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 264 of the complaint.

265. Defendant denies the allegations in paragraph 265 of the complaint.

266. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 266 of the complaint.

267. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 267 of the complaint.

268. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 268 of the complaint.

269. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 269 of the complaint.

270. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 270 of the complaint.

271. Defendant denies the allegations in paragraph 271 of the complaint.

272. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 272 of the complaint.

273. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 273 of the complaint.

274. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 274 of the complaint.

275. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 275 of the complaint.

276. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 276 of the complaint.

277. Defendant denies the allegations in paragraph 277 of the complaint.

278. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 278 of the complaint.

279. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 279 of the complaint.

280. Defendant denies the allegations in paragraph 280 of the complaint.

281. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 281 of the complaint.

282. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 282 of the complaint.

283. Defendant denies the allegations in paragraph 283 of the complaint.

284. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 284 of the complaint.

285. Defendant denies the allegations in paragraph 285 of the complaint.

286. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 286 of the complaint.

287. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 287 of the complaint.

288. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 288 of the complaint.

289. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 289 of the complaint.

290. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 290 of the complaint.

291. Defendant denies the allegations in paragraph 291 of the complaint.

292. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 292 of the complaint.

293. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 293 of the complaint.

294. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 294 of the complaint.

295. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 295 of the complaint.

296. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 296 of the complaint.

297. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 297 of the complaint.

298. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 298 of the complaint.

299. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 299 of the complaint.

**March 2022: The Dunaways Succeed in Driving Another Hispanic Family Out of Staub**

**Court and Their Conspiracy to Drive Plaintiffs Out Continues**

300. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 300 of the complaint.

301. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 301 of the complaint.

302. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 302 of the complaint.

303. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 303 of the complaint.

304. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 304 of the complaint.

305. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 305 of the complaint.

306. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 306 of the complaint.

307. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 307 of the complaint.

308. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 308 of the complaint.

309. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 309 of the complaint.

310. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 310 of the complaint.

311. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 311 of the complaint.

312. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 312 of the complaint.

313. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 313 of the complaint.

314. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 314 of the complaint.

315. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 315 of the complaint.

316. Defendant denies the allegations in paragraph 316 of the complaint.

317. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 317 of the complaint.

318. Defendant denies the allegations in paragraph 318 of the complaint.

319. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 319 of the complaint.

320. Defendant denies the allegations in paragraph 320 of the complaint.

321. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 321 of the complaint.

322. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 322 of the complaint.

323. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 323 of the complaint.

324. Defendant denies the allegations in paragraph 324 of the complaint.

325. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 325 of the complaint.

326. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 326 of the complaint.

327. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 327 of the complaint.

328. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 328 of the complaint.

329. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 329 of the complaint.

330. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 330 of the complaint.

331. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 331 of the complaint.

332. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 332 of the complaint.

333. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 333 of the complaint.

334. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 334 of the complaint.

335. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 335 of the complaint.

336. Defendant denies the allegations in paragraph 336 of the complaint.

337. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 337 of the complaint.

338. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 338 of the complaint.

339. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 339 of the complaint.

340. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 340 of the complaint.

341. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 341 of the complaint.

342. Defendant denies the allegations in paragraph 342 of the complaint.

**FACTUAL ALLEGATIONS REGARDING INTIMIDATION AND HARASSMENT**

343. Defendant repeats and realleges each allegation above as if fully set forth herein.

344. Defendant denies the allegations in paragraph 344 of the complaint.

345. Defendant denies the allegations in paragraph 345 of the complaint.

346. Defendant denies the allegations in paragraph 346 of the complaint.

347. Defendant denies the allegations in paragraph 347 of the complaint.

348. Defendant denies the allegations in paragraph 348 of the complaint.

349. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 349 of the complaint.

350. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 350 of the complaint.

**FACTUAL ALLEGATIONS REGARDING RACIAL AND DISCRIMINATORY ANIMUS  
AND PREJUDICE**

351. Defendant repeats and realleges each allegation above as if fully set forth herein.

352. Defendant denies the allegations in paragraph 352 of the complaint.

353. Defendant denies the allegations in paragraph 353 of the complaint.

354. Defendant denies the allegations in paragraph 354 of the complaint.

355. Defendant denies the allegations in paragraph 355 of the complaint.

**FACTUAL ALLEGATIONS REGARDING FALSE COMPLAINTS AND DEFAMATORY  
STATEMENTS ABOUT PLAINTIFFS**

356. Defendant repeats and realleges each allegation above as if fully set forth herein.

357. Defendant denies the allegations in paragraph 357 of the complaint.
358. Defendant denies the allegations in paragraph 358 of the complaint.
359. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 359 of the complaint.
360. Defendant denies the allegations in paragraph 360 of the complaint.
361. Defendant denies the allegations in paragraph 361 of the complaint.
362. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 362 of the complaint.

**THE IMPACT OF DEFENDANTS' DAILY, LONG-TERM DISCRIMINATORY  
CONDUCT ON PLAINTIFFS AND THEIR FAMILIES**

363. Defendant denies the allegations in paragraph 363 of the complaint.
364. Defendant denies the allegations in paragraph 364 of the complaint.
365. Defendant denies the allegations in paragraph 365 of the complaint.
366. Defendant denies the allegations in paragraph 366 of the complaint.

**FIRST CAUSE OF ACTION**

**(Violation of 42 U.S.C. § 1982 – Property Rights of Citizens)**

**(Against All Defendants)**

367. Defendant repeats and realleges each allegation above as if fully set forth herein.
368. The allegations of paragraph 368 of the complaint require no answer of Defendant.
369. The allegations of paragraph 370 of the complaint require no answer of Defendant but to the extent that they require an answer, Defendant denies those allegations.

370. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 370 of the complaint.

371. Defendant denies the allegations in paragraph 371 of the complaint.

372. Defendant denies the allegations in paragraph 372 of the complaint.

373. Defendant denies the allegations in paragraph 373 of the complaint.

374. Defendant denies the allegations in paragraph 374 of the complaint.

#### **SECOND CAUSE OF ACTION**

**(Violation of 42 U.S.C. § 1985 – Conspiracy to Interfere with Civil Rights)**

**(Against All Defendants)**

375. Defendant repeats and realleges each allegation above as if fully set forth herein.

376. Defendant denies the allegations in paragraph 376 of the complaint.

377. Defendant denies the allegations in paragraph 377 of the complaint.

378. Defendant denies the allegations in paragraph 378 of the complaint.

379. Defendant denies the allegations in paragraph 379 of the complaint.

#### **THIRD CAUSE OF ACTION**

**(Violation of Title VIII of Civil Rights Act of 1968 – Fair Housing Act)**

**(42 U.S.C. § 3617)**

**(Against All Defendants)**

380. Defendant repeats and realleges each allegation above as if fully set forth herein.

381. Defendant lacks sufficient information to either affirm or deny the allegations in paragraph 381 of the complaint.

382. Defendant denies the allegations in paragraph 382 of the complaint.

383. Defendant denies the allegations in paragraph 383 of the complaint.

384. Defendant denies the allegations in paragraph 384 of the complaint.

385. Defendant denies the allegations in paragraph 385 of the complaint.

#### **FOURTH CAUSE OF ACTION**

##### **(Private Nuisance Under New York Law)**

###### **(Against All Defendants)**

386. Defendant repeats and realleges each allegation above as if fully set forth herein.

387. Defendant denies the allegations in paragraph 387 of the complaint.

388. Defendant denies the allegations in paragraph 388 of the complaint.

#### **FIFTH CAUSE OF ACTION**

##### **(Violation of the N.Y. Civil Rights Law § 79-n)**

###### **(Against All Defendants)**

389. Defendant repeats and realleges each allegation above as if fully set forth herein.

390. The allegations of paragraph 390 of the complaint require no answer of Defendant.

391. Defendant denies the allegations in paragraph 391 of the complaint.

392. Defendant denies the allegations in paragraph 392 of the complaint.

393. Defendant denies the allegations in paragraph 393 of the complaint.

#### **SIXTH CAUSE OF ACTION**

##### **(Intentional Infliction of Emotional Distress)**

###### **(Against All Defendants)**

394. Defendant repeats and realleges each allegation above as if fully set forth herein.

395. Defendant denies the allegations in paragraph 395 of the complaint.

396. Defendant denies the allegations in paragraph 396 of the complaint.

#### **PRAYER FOR RELIEF**

Defendant asserts that Plaintiffs are not entitled to any relief they claim in the prayers section of the complaint.

#### **FURTHER ANSWER AND AFFIRMATIVE DEFENSES**

By way of further Answer and as affirmative defenses, Defendant denies that he is liable to Plaintiff on any of the claims alleged and denies that Plaintiff is entitled to any damages or to any relief whatsoever, and the state as follows:

#### **FIRST AFFIRMATIVE DEFENSE**

##### **(Failure to State a Claim)**

1. The complaint fails to state a claim upon which relief can be granted.

#### **SECOND AFFIRMATIVE DEFENSE**

##### **(No Damage)**

2. Without admitting that the complaint states a claim, there has been no damage in any amount, manner, or at all by reason of any act alleged against Defendant in the complaint, and the relief prayed for in the complaint, therefore, cannot be granted.

#### **THIRD AFFIRMATIVE DEFENSE**

##### **(Failure to Mitigate)**

3. The claims made in the complaint are barred, in whole or in part, because of a failure to mitigate damages, if such damages exist.

#### **FOURTH AFFIRMATIVE DEFENSE**

##### **(No Causation)**

4. Plaintiffs' claims against Defendants are barred because Plaintiffs' damages, if any, were not caused by Defendants

#### **FIFTH AFFIRMATIVE DEFENSE**

5. Plaintiffs' claims are barred because, at all relevant times, Defendant acted in good faith and has not violated any rights secured to Plaintiffs under any federal, state, or local rules, regulations, or guidelines.

#### **SIXTH AFFIRMATIVE DEFENSE**

6. Plaintiffs are not entitled to punitive damages as Defendant did not act or fail to act in a manner sufficient to give rise to punitive damages liability.

#### **SEVENTH AFFIRMATIVE DEFENSE**

7. Plaintiffs' claims are barred by the doctrines of waiver, estoppel and/or laches.

#### **EIGHTH AFFIRMATIVE DEFENSE**

8. Defendant has, at all times, acted within his legal rights in the conduct of all of activities and with just cause.

#### **TWELFTH AFFIRMATIVE DEFENSE**

9. Defendant denies that he engaged in any wrongful or improper conduct and, does not, by asserting affirmative defenses herein, assume the burden of proof in this case, which remains with the Plaintiffs.

#### **ADDITIONAL DEFENSES**

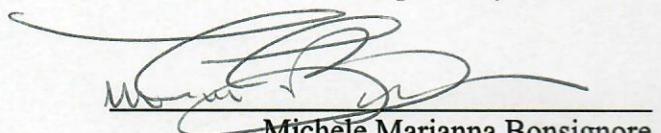
10. Defendant reserves the right to assert additional defenses based on information learned or obtained during discovery.

**WHEREFORE**, Defendant respectfully prays for judgment as follows:

1. That Plaintiffs take nothing by way of their complaint;
2. That the complaint and each and every purported claim for relief therein, be dismissed with prejudice.
3. That Defendant be awarded his costs of suit incurred herein, including attorneys' fees and expenses; and
4. For such other and further relief as the Court deems just and proper.

Dated: 11/12/2024

Respectfully submitted,



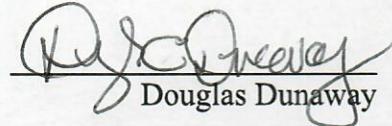
Michele Marianna Bonsignore  
Attorney At Law  
11-44 Jackson Avenue  
Scarsdale, New York 10583  
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914.261.1854

**VERIFICATION**

STATE OF NEW YORK      }  
                              ) ss:  
COUNTY OF NEW YORK    }

DOUGLAS DUNAWAY, being duly sworn, deposes and says:

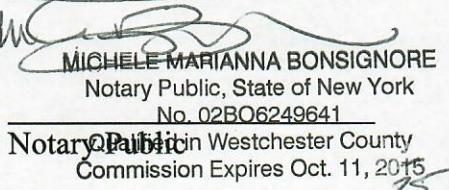
I am a Defendant in this action on behalf of myself and as administrator of the estate of Louise Dunaway. I have read the attached Verified Answer, and it is true to the best of my knowledge, information, and belief.



Douglas Dunaway

Sworn to before me this

12 day of November, 2024



MICHELE MARIANNA BONSIGNORE  
Notary Public, State of New York  
No. 02BO6249641  
Notary Public in Westchester County  
Commission Expires Oct. 11, 2015

**CERTIFICATE OF SERVICE**

I certify that a copy of this Verified Answer was served on November 15, 2024 to the Plaintiffs in this action at the following address:

Brian S. Cohen [BC-2091]  
Gregory A. Blue [GB-9569]  
Joanna Sandolo [JS-9187]  
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White Plains, NY 10601  
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Email: [jsandolo@lcb-law.com](mailto:jsandolo@lcb-law.com)  
*Attorneys for Plaintiffs*

DATE: Nov 15, 2024

Respectfully submitted,



Michele Marianna Bonsignore  
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